

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GENNAIDY SHUBITIDZE)	
)	
Plaintiff,)	
)	
Vs.)	No.
)	
BOXER PROPERTY,)	
)	
Defendant.)	

COMPLAINT AT LAW

NOW COMES the plaintiff, GENNAIDY SHUBITIDZE, by his attorneys. BENJAMIN & SHAPIRO, LTD., and for his Complaint at Law against the Defendant, BOXER PROPERTY, he alleges as follows:

Introduction

1. Plaintiff, Gennaidy Shubitidze, brings this action pursuant to Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000e. Plaintiff contends that the Defendant's officials discriminated against him by verbally harassing humiliating and berating him because of his national origin and ancestry (Russian).

Jurisdiction

2. This Court has jurisdiction over the subject matter of this civil action pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-16.

Venue

3. Venue is proper in this judicial district under 42 U.S.C. Section 2000e-5(f)(3) and 5 U.S.C. § 7703(b)(2); as Plaintiff is employed by SOS Security, Inc., a contractor for the Defendant at the time of the discrimination and plaintiff's employment records are maintained by SOS Security in this judicial district, and decisions adverse to Plaintiff's employment that are the subject of this civil action were made in this judicial district.

Parties

4. Plaintiff, Gennaidy Shubitidze, is a male of Russian heritage and ancestry who is a citizen relevant to this suit he is still employed by SOS Security as a security guard, which is still a contractor for the Defendant Boxer Property.
5. Defendant, Boxer Property is a commercial property management company that is located in the City of Schaumburg, County of Cook and State of Illinois.

Statement of Facts

6. The Defendant hired SOS Security, Inc. as its contractor to provide security for the property located at 1750 E. Golf Road, Schaumburg, IL.
7. From August 2017 and continuing to the present the Plaintiff has been verbally harassed, repeatedly humiliated and consistently berated by Jeff Berkovitz, the property manager who is in charge of the particular property.
8. Specifically, from his first days at the property, he displayed an utter dislike of the plaintiff because the plaintiff is Russian.
9. This dislike was displayed to the plaintiff in the following ways, although not inclusive of all of his actions:
 - a. When the plaintiff tried to speak to him, he would consistently interrupt the plaintiff by asking him why are you wasting my time?
 - b. Berkovitz would completely ignore him in front of the building's tenants;
 - c. Berkovitz would seek to blame the plaintiff for the building's problems, including his failure to provide safe parking for the tenants;
 - d. Berkovitz would not take seriously the plaintiff's efforts to explain to him some of the building's problems, citing that he told the plaintiff's employers at SOS Security the plaintiff's difficulties with speaking English;
 - e. Berkovitz sought to try to humiliate the plaintiff and said that he was happy that he did not allow additional Russian security officers to work in the building.
10. When the plaintiff's managers from SOS did not support Berkovitz's requests, he reduced the plaintiff's working hours to a great extent.
11. The working hours of other similarly situated non-Russian employees were not suspended under similar circumstances.

Count One

Ancestry and Heritage Discrimination in Violation of Title VII of the Civil Rights Act of 1964, 42 USC 2000e. et seq.

12. Paragraphs one (1) through eleven (11) are realleged and incorporated by reference herein.
13. As a result of good faith complaints and opposition to the defendant's national origin and ancestry discrimination and racial harassment, the defendant discriminated against the plaintiff by subjecting him to stricter scrutiny than his co-workers, to demeaning and hostile treatment, to wholly unwarranted negative performance feedback, to being subjected to unwarranted discipline, to being assigned weekend shifts and holidays and reduced hours and, **ultimately, his termination**. Plaintiff should have received a promotion **but was instead fired**.

WHEREFORE, Plaintiff, Gennaidy Shubitidze, respectfully requests that this Court enter judgment against the Defendant and provide the following relief:

- a. Actual damages, including appropriate amounts of back pay and front pay and the money lost from the failure to promote
- b. Compensatory for national origin and ancestry discrimination, and hostile work environment
- c. Costs and reasonable attorney's fees.

GENNAIDY SHUBITIDZE

By: _____

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